

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Improving Public Safety Communications	)	WT Docket No. 02-55
In the 800 MHz Band	)	
	)	
Illinois Public Safety Agency Network Request	)	
For Supplemental Waiver of July 31, 2012	)	
Deadline for Completion of Rebanding	)	

To: Public Safety and Homeland Security Bureau

**MOTION FOR LEAVE TO RESPOND**

Nextel Communications, Inc. (“Nextel”), a wholly owned subsidiary of Sprint Nextel Corporation, hereby respectfully moves for leave to respond to the Reply to Opposition submitted by the Illinois Public Safety Agency Network (“IPSAN”) on March 22, 2013 (“Reply”). That Reply concerns the merits of IPSAN’s Request for Supplemental Waiver of July 31, 2012 Deadline for Completion of Rebanding submitted by on March 8, 2013 (“Request”). Because IPSAN’s Reply makes a number of questionable factual, legal and policy assertions, allowing Nextel to respond will provide the Bureau with a more accurate and complete record upon which to base a decision regarding IPSAN’s Request.

The undersigned attests that the statements and representations made in this Opposition are true and accurate to the best of his or her knowledge.

**NEXTEL COMMUNICATIONS, INC.**

By: /s/ James B. Goldstein

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April 17, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of April, 2013, a true copy of the foregoing Motion was served electronically upon:

**PSHSB800@fcc.gov**

**Robert Schwaninger  
rschwaninger@sa-lawyers.net**

/s/ Patrick R. McFadden

Patrick R. McFadden

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